

**SUPPORTING STATEMENT**  
**Child Care Access Means Parents in School (CCAMPIS) Program**  
**FOR PAPERWORK REDUCTION ACT SUBMISSION**

**A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section<sup>1</sup>. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

The Department of Education (Department) is requesting approval of a reinstatement with changes of a previously approved collection, the Child Care Access Means Parents in School (CCAMPIS) Program Annual Performance Report (APR) (OMB No.: 1840-0763). The CCAMPIS Program provides grants to institutions of higher education to assist the institutions in providing campus-based child care services to low-income students, in accordance with SEC. 410. CHILD CARE ACCESS MEANS PARENTS IN SCHOOL, Title IV, Part A, Subpart 7, Sec. 419N; § e(1) (A) of the Higher Education Act of 1965, as amended (HEA) and the Education Department General Administrative Regulations (EDGAR). <http://www2.ed.gov/programs/campisp/legislation.html>

The Department will use the collected information to verify that grantees are making substantial progress toward the achievement of approved activities under the CCAMPIS Program.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Department uses the data collected to: (a) evaluate a grantee's accomplishments; and (b) aid in compliance monitoring.

In addition, the annual performance reports are used to collect programmatic data for purposes of annual reporting; budget submissions to OMB; Congressional hearings and testimonials; Congressional inquiries; and responding to inquiries from higher education interest groups and the general public.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.**

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

The data being requested allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. An Adobe Acrobat form has been developed for grantees to use to enter the data and submit the entire report via e-mail. CCAMPIS Program grantees have been submitting the APR via e-mail since the 2000-2001 project year, and all grantees are currently required to submit the APR data via e-mail.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Since the information submitted in the report is unique to each respondent, no duplication exists as far as can be determined. No other collection instrument is available to collect the information that is being requested.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This information collection does not involve small businesses or other small entities.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Performance information is collected annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine whether the grantee is making satisfactory progress in meeting the goals proposed in its initial application, prior to awarding continuation funding. Without this data collection, the Student Service office would be unable to make continuation awards, comply with the authorizing statute and EDGAR, and develop improved policies for program administration.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No information will be collected in the manner covered under any of the special circumstances outlined.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department will publish 60-day and 30-day Federal Register Notices to solicit public comment on the report. The Department will also solicit informal views and comments from customers during the meeting of project directors, as appropriate, during yearly national and regional education and accreditation conferences and during the pre-application workshop conducted for prospective applicants prior to the competition.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

The Department does not provide any payments or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.<sup>2</sup> If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.**

The Department's disclosure policies adhere to the provisions of the Privacy Act.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The APR form does not include questions about sexual behavior and attitudes, religious beliefs, or other items that are commonly considered sensitive and private.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size,**

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<sup>2</sup> Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The estimated reporting burden hours are 28 hours per respondent. We expect approximately 350 respondents, each of whom will submit the APR once a year. Therefore, the estimated burden hours for this collection of information are 28 hours per 350 respondents or 9,800 total burden hours. Burden hours are shown for the total number of estimated respondents for the APR.

|   |        |
|---|--------|
| Estimated number of respondents           | 350    |
| Estimated preparation time per respondent | 28 hrs |
| Estimated total burden hours              | 9,800  |
| Average annual estimated burden hours     | 9,800  |

(Estimated Burden: 9,800 hours total -- Number of hours of preparation time (28) times total number of respondents (350) equals estimated burden hours.)

Most of the costs of this data collection are borne by the Federal Government. The annual cost to the grantee to respond to this data collection is estimated as follows:

Estimated annual costs to applicants:

|  |                 |
|--|-----------------|
| Professional<br>(350 personnel X 21 hours @ \$30 per hour) | \$220,500       |
| Clerical<br>(350 clerical X 7 hours @ \$ 12 per hour)      | <u>\$29,400</u> |
| Total estimated costs to respondents                       | \$249,900       |

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
  
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
  
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost: \$0  
 Total Annual Costs (O&M) : \$0  
 Total Annualized Costs Requested : \$0

The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any start-up costs.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The largest portion of the Government’s cost is borne directly by the Department of Education in designing the report form, securing clearance of the form, and in collecting, aggregating and disseminating the information.

| <b>Estimated annual cost to the Federal Government</b>   |                   |
|--|-------------------|
| Professional staff to update report form and prepare clearance package (GS 12 employee)<br>\$39 per hour X 80 hours  | \$3,120.00        |
| Overhead costs related to facilities, administration and other indirect costs, plus accrual of leave and fringe benefits, estimated at 50% of salary<br>\$3,120 X 50 percent | \$,1560.00        |
| Clerical staff to type, route, and copy report form<br>\$18 per hour X 10 hours  | \$180.00          |
| Overhead costs: \$180 X 50 percent   | \$90.00           |
| Other Department staff to review and approve the request (GS 15 employee) \$71 per hour X 5 hours  | \$355.00          |
| Overhead costs: \$355 X 50 percent   | \$177.50          |
| OMB review (estimated)<br>\$39 per hour X 8 hours  | \$312.00          |
| Overhead costs: \$312 X 50 percent   | \$156.00          |
| <b>Other Administrative Costs</b>  |                   |
| Posting annual performance report to World Wide Web<br>2 hours X 1 staff @ \$39 per hour   | \$78.00           |
| Overhead costs: \$78.00 X 50 percent   | \$39.00           |
| Professional staff to review and edit reports for dissemination<br>\$39 per hour X 40 hours  | \$1,560.00        |
| Overhead costs: \$1,560 X 50 percent   | \$780.00          |
| <b>Total Annual Government Cost</b>  | <b>\$8,407.50</b> |

**15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency’s control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

This is a reinstatement; therefore, all burden is new.

Compared to the previously approved collection, burden has increased by 1,050 hours due to increases in the number of respondents and the burden hours per respondent. As a result of increased funding, the number of respondents (grantees) increased. The current burden estimate is based on the anticipated 350 respondents expected for the 4 year reporting cycle.

In addition, five new data fields have been added to the CCAMPIS APR:

- 1a, the number of student parents enrolled at least halftime,
- Section IV, Part A, the total number of students participating in the services provided by the childcare center,
- Part B, question G, children of the employees of the institution,
- Part B, question H, children of the non-affiliated members of the community, and
- Section V, question J, the percentage of total CCAMPIS funds used to reduce the cost of enrolling the children of low-income student parents.

Regarding burden hours, all of these questions will slightly increase the burden hours required for new grantees. For existing grantees, this may not increase their burden because these questions will be optional.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The results of the collected information will not be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Department will display the expiration date for the OMB approval as required on the approved Annual Performance Report.

**18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

There are no exceptions to the certification statement.